

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

Violations:

v.

D-1 Akeem Richards-Crawford

18 U.S.C. § 371

D-2 Dwayne Harrison

18 U.S.C. § 554

D-3 Jannai Stewart,

18 U.S.C. § 2

Defendants.

Case: 5:25-cr-20477

Assigned To : Levy, Judith E.

Referral Judge: Patti, Anthony P.

Assign. Date : 6/25/2025

Description: INDI USA v RICHARDS ET AL (JP)

**INDICTMENT**

THE GRAND JURY CHARGES:

**GENERAL ALLEGATIONS**

1. Akeem Richards-Crawford ("RICHARDS-CRAWFORD") is a resident and citizen of Canada who traveled to the United States to smuggle firearms and firearm magazines into Canada from the Eastern District of Michigan.

2. Dwayne Harrison ("HARRISON") is a resident and citizen of Canada who traveled to the United States to smuggle firearms and firearm magazines into Canada from the Eastern District of Michigan, and who illegally crossed into Canada from the Eastern District of Michigan with firearms and firearm magazines.

3. Jannai Stewart (“STEWART”) is a resident and citizen of Canada who attempted to pick up HARRISON in Canada after HARRISON illegally crossed into Canada from the Eastern District of Michigan with a backpack containing 36 firearms and firearm magazines.

4. Coconspirator A, the then-girlfriend of RICHARDS-CRAWFORD, is a resident and citizen of Canada who traveled to the United States to assist RICHARDS-CRAWFORD in smuggling firearms and firearm magazines into Canada from the Eastern District of Michigan.

5. The Grand Jury incorporates by reference and realleges these General Allegations into each and every count of this Indictment as though fully alleged therein.

### **STATUTES AND REGULATIONS**

#### ***The Export Control Reform Act and the Export Administration Regulations***

6. Pursuant to the Export Control Reform Act of 2018 (“ECRA”), 50 U.S.C. §§ 4801-4852, the Department of Commerce (“DOC”) reviews and controls the export of certain items, including certain firearms and related parts and components, from the United States through the Export Administration Regulations (“EAR”), 15 C.F.R. parts 730-774.

7. The EAR impose licensing and other requirements for items subject to the EAR to be exported lawfully from the United States or re-

exported lawfully from one foreign destination to another. The most sensitive items subject to EAR controls are identified on the Commerce Control List (“CCL”), published at 15 C.F.R. part 774, Supp. No. 1. Items on the CCL are categorized by an Export Control Classification Number (“ECCN”) based on their technical characteristics. Each ECCN has export control requirements depending on the destination, end user, and end use.

8. “Non-automatic and semi-automatic firearms equal to .50 caliber (12.7 mm) or less” are controlled on the CCL under ECCN 0A501.a. Additionally, “[d]etachable magazines with a capacity of 17 to 50 rounds ‘specially designed’ for a commodity controlled by paragraph .a . . . of this entry” are controlled on the CCL under ECCN 0A501.d. Items classified under ECCN 0A501.a and ECCN 0A501.d are controlled for Firearms Convention (“FC1”) reasons and require a license for export to Canada.

9. It is a crime to willfully violate, attempt to violate, conspire to violate, or cause a violation of any order, license, regulation, or prohibition issued pursuant to ECRA. 50 U.S.C. § 4819.

### ***Smuggling***

10. Title 18, United States Code, Section 554 makes it a crime to fraudulently or knowingly export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object

contrary to any law or regulation of the United States, including ECRA and the EAR, or receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

**COUNT ONE**

**(18 U.S.C. § 371 - Conspiracy to Smuggle Firearms from the United States)**

11. In or about October 2023, up to and including on or about October 26, 2023, in the Eastern District of Michigan and elsewhere, RICHARDS-CRAWFORD, HARRISON and STEWART, did willfully and unlawfully combine, conspire, and agree together, with each other, and with other persons, both known and unknown to the Grand Jury, to commit one or more offenses against the United States, to wit, to smuggle firearms and firearms magazines from the United States to Canada in violation of Title 18, United States Code, Section 554; and all in violation of Title 18, United States Code, Section 371.

**OBJECT OF THE CONSPIRACY**

12. The object of the conspiracy was to obtain and smuggle firearms and firearms magazines from the United States into Canada.

**MANNER AND MEANS OF THE CONSPIRACY**

13. The conspirators used the following manner and means to accomplish their objectives.

14. In or about October 2023, RICHARDS-CRAWFORD and HARRISON, traveled to the United States from Canada to obtain firearms and firearm magazines and then smuggle those firearms and firearms magazines into Canada.

15. RICHARDS-CRAWFORD flew into the United States from Canada and later rented a hotel room (Room 206) at a Comfort Inn, in Warren, Michigan.

16. HARRISON drove into the United States from Canada, rented a second vehicle in the Detroit, Michigan area, stayed in the hotel room (Room 206) at the Comfort Inn rented by RICHARDS-CRAWFORD, traveled outside the state of Michigan to obtain firearms and firearms magazines, and then returned to the Eastern District of Michigan with the firearms and firearms magazines so that he and RICHARDS-CRAWFORD could smuggle the firearms and firearms magazines into Canada.

17. RICHARDS-CRAWFORD and HARRISON frequently met each other (including at the Comfort Inn in Warren, Michigan) to plan the firearms smuggling, including by conducting a test-run to the Algonac, Michigan area—a community at the mouth of the St. Clair River that is commonly used for

smuggling between the United States and Canada—where the smuggling was to occur.

18. On or about October 26, 2023, in the early morning hours, RICHARDS-CRAWFORD and HARRISON drove together to the Algonac, Michigan smuggling location with a backpack containing 36 firearms with firearms magazines.

19. The conspirators arranged for an unknown coconspirator to leave the Canadian side of the St. Clair River on a jet ski in the middle of the night, travel across a narrow portion of the St. Clair River to the United States side of the river, pick up HARRISON and the backpack of firearms and firearms magazines in the Eastern District of Michigan, and transport HARRISON and the firearms and firearms magazines back to the Canadian side of the river.

20. On or about October 26, 2023, in the early morning hours, STEWART drove to a location near the marina where HARRISON illegally crossed back into Canada in order to pick up HARRISON and the bag of 36 firearms and firearms magazines.

21. HARRISON concealed his smuggling activities by traveling in the middle of the night and dressing in all black.

22. At no time, did RICHARDS-CRAWFORD or HARRISON apply for, or obtain, a license to export the sixteen different types of firearms and magazines found in HARRISON's backpack.

**OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

23. On or about October 7, 2023, Akeem RICHARDS-CRAWFORD, a Canadian citizen, flew from Toronto, Canada to Miami, Florida.

24. On or about October 13, 2023, Dwayne HARRISON, a Canadian citizen, and "RS," a female Canadian citizen, entered the United States from Canada via Port Huron, Michigan (via the Blue Water Bridge Port of Entry), driving a silver Acura with an Ontario, Canada license plate number ("the Ontario Acura").

25. Beginning on or about October 20, 2023 and continuing through on or about October 26, 2023, RICHARDS-CRAWFORD rented Room 206 at the Comfort Inn in Warren, Michigan.

26. On or about October 17, 2023, HARRISON searched the Internet, using his iPad 12, for police presence on highways. HARRISON searched: "Which state has the most patrolled highways and freeway and which has the least," and "States with the most heavily enforced traffic laws."

27. On or about October 18, 2023, Dwayne HARRISON leased a 2022 red Kia Sportage, bearing a Florida license plate number ("the Florida Kia"), from

the Detroit Metropolitan Airport, with a return date of on or about October 25, 2023.

28. On or about October 19 and October 20, 2023, HARRISON traveled from the Eastern District of Michigan to the Houston, Texas area in the Florida Kia (traveling through the Cincinnati, Ohio, Louisville, Kentucky, and the Nashville and Memphis, Tennessee areas). On or about October 20 and October 21, 2023, HARRISON remained in the Houston, Texas area. Between on or about October 21 and October 23, 2023, HARRISON drove back to the Eastern District of Michigan, staying overnight in the Memphis, Tennessee area on or about October 21, 2023, and driving through the Indianapolis, Indiana area on or about October 22, 2023.

29. During this trip between the Eastern District of Michigan and the Houston, Texas area, HARRISON obtained firearms and firearms magazines. In the weeks leading up to this trip, including between on or about October 7 and October 19, 2023, an individual, "DW", acquired approximately fifteen firearms, including Glock handguns, in the Houston, Texas area. A second individual, "TM", acquired additional Glock firearms in the Cincinnati, Ohio area in or about mid-October 2023.

30. On or about October 21, 2023, HARRISON searched the internet, using his iPad 12, for border crossing exam procedures. HARRISON searched:



“Does your car get searched when crossing to Windsor,” “Do border guards scan people’s cars with metal detectors,” and “From the ground up, X-rays scan vehicles for contraband at border checkpoints.”

31. On or about October 23, 2023, Coconspirator A drove from Canada into the United States (via the Blue Water Bridge Port of Entry) in an Ontario registered white Subaru Forester (“the Ontario Subaru”). Coconspirator A brought \$10,700 in cash with her, in all \$100 bills, falsely declaring lesser amounts when questioned by officers from the Department of Homeland Security, United States Customs and Border Protection (“CBP”). Coconspirator A admitted to CBP officers that she was going to Detroit, Michigan to meet her boyfriend, RICHARDS-CRAWFORD.

32. Coconspirator A departed the Blue Water Bridge and drove to the area of the Motor City Casino in Detroit, Michigan without stopping at the casino itself. Instead, Coconspirator A engaged in a pattern of driving indicative of counter surveillance maneuvers, before driving to the Comfort Inn in Warren, Michigan and ultimately parking at the neighboring Best Western hotel.

33. On or about October 23, 2023, after returning to Michigan, HARRISON retrieved a very large duffle bag from the Florida Kia. As seen on hotel surveillance video, the duffle bag appeared to be heavy and full. HARRISON

and RICHARDS-CRAWFORD proceeded to enter the Comfort Inn and carry the duffle bag into Room 206.

34. On or about October 25, 2023, RICHARDS-CRAWFORD and Coconspirator A separately checked into the Godfrey Hotel, in Detroit, Michigan.

35. On or about October 25, 2023, at approximately 6:20 p.m., HARRISON left the Comfort Inn in Warren and drove the Florida Kia to a nearby Lowes home improvement store. Approximately five minutes later, RICHARDS-CRAWFORD and Coconspirator A arrived in the Ontario Subaru. RICHARDS-CRAWFORD and Coconspirator A got into the Florida Kia and the three conspirators departed.

36. The coconspirators then drove—employing counter-surveillance maneuvers—to the Algonac, Michigan area, driving eastbound on M-29 (also referred to as “Pointe Tremble Drive”), past a business called St. Clair Flats Taxidermy, proceeding to an Algonac Kroger grocery store, where they turned around and headed back westbound on M-29.

37. The coconspirators then stopped at the roadside parking lot of the St. Clair Flats Taxidermy. The St. Clair Flats Taxidermy is across the street from a single-family home on Point Tremble Drive that has a backyard that abuts the St. Clair River. The property is a frequent site used by smugglers.

38. The coconspirators returned to the Lowes parking lot in Warren, Michigan, this time taking a different route; after arriving, RICHARDS-CRAWFORD and Coconspirator A left in the Ontario Subaru and HARRISON returned to the Comfort Inn.

39. At approximately 10:48 p.m. on or about October 25, 2023, RICHARDS-CRAWFORD sent STEWART the Ontario, Michigan address “4737 old river road port Lambton” via Snapchat. This address is located near the Chenal E’Carte, a channel off the Canadian side of the St. Clair River.

40. At approximately 12:02 a.m. on or about October 26, 2023, RICHARDS-CRAWFORD arrived at the Comfort Inn in Warren, Michigan and entered Room 206.

41. At approximately 12:42 a.m. on or about October 26, 2023, HARRISON exited Room 206 wearing all black clothing, carrying a duffel bag and a backpack. Shortly thereafter RICHARDS-CRAWFORD exited Room 206 carrying a very large duffel bag that appeared, from hotel surveillance video, to be full.

42. At approximately 12:43 a.m. on or about October 26, 2023, HARRISON and RICHARDS-CRAWFORD exited the Comfort Inn Hotel. HARRISON and RICHARDS-CRAWFORD each placed their duffel bags in the rear hatch of the Ontario Acura and HARRISON placed his backpack, which

appeared to be full, in the backseat of the Florida Kia. RICHARDS-CRAWFORD (driving) and HARRISON (front passenger seat) departed the hotel shortly thereafter. The Ontario Acura remained in the parking lot of the Comfort Inn.

43. RICHARDS-CRAWFORD and HARRISON then drove to the exact same area in Algonac, Michigan that they had driven to hours earlier, on the evening of October 25, 2023, during their dry run.

44. At approximately 1:08 a.m. on or about October 26, 2023, RICHARDS-CRAWFORD sent HARRISON's cellphone number—ending in 7805—to STEWART via Snapchat.

45. Close in time to when RICHARDS-CRAWFORD and HARRISON arrived in the Algonac area, a jet ski driven by an unknown coconspirator exited the Chenal E'Carte and traveled towards the area near the home on Point Tremble Drive that is frequently used for smuggling.

46. At approximately 2:20 a.m. on or about October 26, 2023, U.S. Border Patrol surveillance saw a jet ski, with two people onboard, travel back across the St. Clair River toward the Chenal E' Carte in Canada.

47. At approximately 2:31 a.m. on or about October 26, 2023, HARRISON unsuccessfully tried to call STEWART. HARRISON then messaged STEWART: "Call / text me back."

48. At approximately 2:34 a.m. on or about October 26, 2023, HARRISON and STEWART had a one minute and twenty-four second phone call.

49. At approximately 2:36 a.m. on or about October 26, 2023, STEWART tried calling RICHARDS-CRAWFORD two times.

50. Around this same time on or about October 26, 2023, a Canadian law enforcement officer, on the Canadian side of the St. Clair River, observed HARRISON hiding near bushes in a dimly-lit parking lot of a marina with access to the Chenal E' Carte. HARRISON was wearing all black clothing and a backpack.

51. HARRISON approached the Canadian Law enforcement officer, who was in an unmarked vehicle and, upon realizing that he had made contact with a law enforcement officer (and not STEWART), ran away and dropped the backpack.

52. HARRISON fled the parking lot on foot and evaded law enforcement. Canadian law enforcement officers recovered the abandoned backpack and found that it contained 36 handguns with magazines, all of which were individually wrapped in tube socks. Of the 36 firearms, 26 were handguns manufactured by Glock.

53. At approximately 2:45 a.m. on or about October 26, 2023, after fleeing from law enforcement, HARRISON texted STEWART: "4704 Crescent

Dr, Port Lambton ON NOP 2B0.” This address is an approximate eight-minute walk from the “4737 old river road port Lambton” address that RICHARDS-CRAWFORD sent STEWART at approximately 10:48 p.m.

54. HARRISON then texted STEWART: “Come get me” and then, five seconds later, “Cops came.”

55. At approximately 2:50 a.m. on or about October 26, 2023, HARRISON texted STEWART: “4670 Crescent Dr, Port Lambton ON NOP 2B0.” This address is an approximate three minute walk from 4704 Crescent Drive.

56. At approximately 2:57 a.m. on or about October 26, 2023, Canadian law enforcement officers were on patrol in the area looking for the man who had just fled when they encountered STEWART driving a car registered out of Bolton, Ontario. STEWART had a global positioning system visible on his cell phone that showed he intended to drive to a street near the marina where the backpack with the guns had been dropped.

57. During STEWART’s interaction with Canadian law enforcement officer, his cell phone received repeated calls from HARRISON’s 7805 cellphone number and messages over a social media application from someone named “TallMan Harry.”

58. HARRISON tried to call STEWART multiple times between approximately 2:55 a.m. and 3:06 a.m. on October 26, 2023.

59. On October 26, 2023, at approximately 3:45 a.m., Canadian law enforcement began to receive cellular location data for HARRISON's 7805 cellular telephone. Cellular data showed that HARRISON was still present at approximately that time in the Port Lambton, Ontario area.

60. The dark black/gray large duffel bag that RICHARDS-CRAWFORD placed in the rear hatch of the Ontario Acura contained numerous empty Glock firearm cases.

**COUNT TWO**  
**Smuggling Firearms and Firearm Magazines from the United States**  
**(18 U.S.C. § 554)**

61. Paragraphs 1 through 60 of this Indictment are re-alleged and incorporated by referenced as if fully set forth herein.

62. Beginning no later than in or about October 2023, and continuing to at least on or about October 26, 2023, in the Eastern District of Michigan and elsewhere, the defendants Akeem RICHARDS-CRAWFORD, Dwayne HARRISON, and Jannai STEWART, together with others known and unknown, did fraudulently and knowingly export and send, attempt to export and send, and aid, abet, and cause others to export and send and attempt to export and send firearms and firearm magazines from the United States to Canada, contrary to U.S. laws and regulations, that is the Export Control Reform Act, Title 50, United States Code, Sections 4801-4852, and the Export Administration Regulations, Title 15,

Code of Federal Regulations, parts 730-774, and receive, conceal, buy, sell, and facilitate the transportation and concealment of such firearms and firearms magazines prior to exportation, knowing the same to be intended for exportation, contrary to such laws and regulations.

63. All in violation of Title 18, United States Code, Sections 554 and 2.

### **FORFEITURE ALLEGATIONS**

64. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to RICHARDS-CRAWFORD, HARRISON, and STEWART of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Indictment.

65. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of RICHARDS-CRAWFORD, HARRISON, and STEWART:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or



- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

**THIS IS A TRUE BILL.**

*s/ Grand Jury Foreperson*  
Grand Jury Foreperson

JEROME F. GORGON JR.  
United States Attorney

*s/ Douglas C. Salzenstein*  
DOUGLAS C. SALZENSTEIN  
Chief, Homeland Security Task Force  
Assistant United States Attorney

*s/ Chantelle Dial*  
CHANTELLE DIAL  
Trial Attorney  
National Security Division  
United States Department of Justice

Dated: June 25, 2025

Assigned To : Levy, Judith E.

Referral Judge: Patti, Anthony P.

Assign. Date : 6/25/2025

Description: INDI USA v RICHARDS ET AL (JP)

United States District Court  
Eastern District of Michigan**Criminal Case Cover Sheet**

Case Number

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

|  |                            |
|--|----------------------------|
| <b>Companion Case Information</b>  | Companion Case Number:     |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : | Judge Assigned:            |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      | AUSA's Initials: <i>DS</i> |

Case Title: USA v. Akeem Richards-Crawford, Dwayne Harrison, Jannai StewartCounty where offense occurred : St. Clair and MacombCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☒ Indictment/\_\_\_ Information --- no prior complaint.

\_\_\_ Indictment/\_\_\_ Information --- based upon prior complaint [Case number: ]

\_\_\_ Indictment/\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 25, 2025

Date

*Douglas C. Salzenstein*  
 \_\_\_\_\_  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.